







NF Formulas

PhytoPharmica

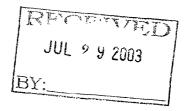
Tyler Encapsulations

Vitaline Formulas

*03 JUL 31 P2:07 7764

July 24, 2003

Mr. Robert Moore Office of Nutritional Products, Labeling & Dietary Supplements, HFS 811 Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740



Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name ImmunoKids ®

Statement

"The Learner's Edge® System gives kids the edge they need in today's complex and often unhealthy environment, with support for natural ...immune function....

Ingredient(s) to which claim refers

Vitamin C Calcium 7inc IP-6 (inositol hexaphosphate) Inositol Grape (Vitis vinifera) seed polyphenols Soy bean (Glycine max) Cat's Claw extract (Uncaria tomentosa) Aloe (Aloe vera) Citrus Bioflavonoids Monolaurin

Pine Bark standardized extract (Pinus

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.

Mário Roxas, N.D.

Director of Scientific and Technical Affairs

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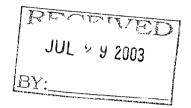
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Product Name ImmunoKids ® Statement

"Introducing a natural support system that every young body needs."*

Ingredient(s) to which claim refers

Vitamin C Calcium Zinc

IP-6 (inositol hexaphosphate)

Inositol

Grape (Vitis vinifera) seed polyphenols

Soy bean (Glycine max)

Cat's Claw extract (Uncaria tomentosa)

Aloe (Aloe vera) Citrus Bioflavonoids

Monolaurin

Pine Bark standardized extract (Pinus

maritima)

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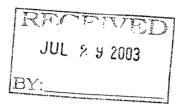
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Product Name ImmunoKids ®

Statement

"This natural support system is the result of years of experience and developed by leading children's medical experts at the International Child Development Resource Center (ICDRC) and specialists in naturopathic therapeutics at Integrative Therapeutics, Inc."*

Ingredient(s) to which claim refers

Vitamin C Calcium Zinc

IP-6 (inositol hexaphosphate)

Inositol

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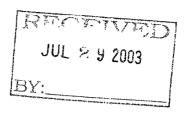
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Product Name ImmunoKids ® Statement

"The Learner's Edge® System...it's what every young body needs, and what every parent should know about."*

Ingredient(s) to which claim refers

Vitamin C Calcium Zinc

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